



# MOSER LAW FIRM, P.C.

WORKERS' RIGHTS ATTORNEYS

STEVEN J. MOSER, ESQ.  
smoser@moseremploymentlaw.com

3 SCHOOL STREET, SUITE 207B  
GLEN COVE, NEW YORK 11542

TEL (516) 671.1150  
FAX (516) 882-5420

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**VIA ECF**

Hon. Joanna Seybert, USDJ  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

**RE: Castillo, Et al. v. Perfume Worldwide  
Case No. 17-CV-2972 (JS)(AKT)**

Dear Judge Seybert:

Yesterday, during a telephone conference with Robyn Weinstein, ADR Administrator for the Eastern District, the parties agreed to mediate within 60 days. Andrew Kimler has confirmed that he is available to mediate the case.

In light of the foregoing, the parties jointly respectfully request that the case be stayed for a period of 60 days to allow the parties to proceed in mediation. The parties jointly request that the 60 day stay requested of this Court include (1) the pending motion to dismiss which would otherwise be filed October 9, 2018, (2) the Court's order dismissing without prejudice the claims of all opt-ins who do not file a demand for arbitration on or before October 17, 2018 (thereby extending that deadline to December 5, 2018) and (3) depositions and discovery.

The parties have separately agreed between themselves (1) to stay all pending arbitrations and charges filed with the EEOC for 60 days, (2) that Plaintiffs shall not file any additional lawsuits, arbitrations, or charges against the Defendants for 60 days, and (3) that all relevant statutes of limitations and filing deadlines shall be tolled for 60 days.

Respectfully submitted,



Steven John Moser